

IN THE UNITED STATES DISTRICT COURT FOR THE

WESTERN DISTRICT OF VIRGINIA

Charlottesville Division

CLERK'S OFFICE U.S. DIST. COURT
AT CHARLOTTESVILLE, VA
FILED

SEP 23 2021

Elizabeth Sines, et al

Plaintiffs

v

Jason Kessler, et al

Defendants

Case No: 3:17-cv-072-NKM

JULIA C. DUDLEY, CLERK
BY: 
DEPUTY CLERK

MOTION TO ORDER THE UNITED STATES TO PROVIDE CANTWELL WITH
REASONABLE ACCESS TO THE COURT AND THE RECORD

Comes now the Defendant, Christopher Cantwell, and, he Moves this Court To Order The United States to Provide him Reasonable Access To The Court And The Record by ordering the Warden of USP-Marion, Daniel Sproul, and his staff to provide Cantwell with unrestricted access to paper copies of the Second Amended Complaint and other record documents and discovery. In support, Cantwell states as follows:

- 1) Cantwell has previously averred to his conditions of confinement at USP-Marion, his limited access to discovery and record materials, his need for legal assistance, and, other difficulties, and, has presented case law and asked that this Court Order the United States to appear and answer these allegations. He incorporates all of this material herein by reference.
- 2) As per the attached declaration, USP-Marion staff members Nathan Simpkins and Kathy Hill have informed Cantwell that, after consultation with BOP counsel Katherine Seireveld, they will not comply with the Court's Order of Doc 1067 by, among other things, allowing Cantwell to possess a physical copy of the Second Amended Complaint.

- 3) As previously pled, the Department of Justice has an interest in this proceeding and obstructing this proceeding, while a brief review of a legal database such as LEXIS NEXIS or WestLaw will quickly show that the USP-Marion CMU is essentially the BOP's "obstruction of justice unit", a unit where the BOP places prisoners involved in legal proceedings where the DOJ wants to put its finger on the scale by denying access to the Courts or otherwise coercing prisoners into behaving before the Courts as directed.
- 4) Given the conduct of USP-Marion staff, who are certainly at the direction of Warden Daniel Sproul, as well as BOP Counter Terrorism Unit ("CTU") Director J Simmons and likely BOP Intelligence Analyst Michael Collis as well, intervention by the Court is needed to ensure that Cantwell can fully and fairly litigate this matter. Sproul should be ordered under penalty of contempt to provide Cantwell with unrestricted access to public record documents in this matter as well as the discovery.

Thus, for good cause shown, Cantwell moves this Court to Order the United States to provide him with reasonable access to the Court and the record.

Respectfully Submitted,

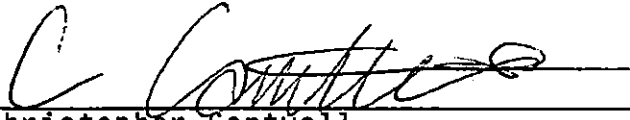


Christopher Cantwell
USP-Marion
PO Box 1000
Marion, IL 62959

CERTIFICATE OF SERVICE

I hereby certify that this Motion to Order the United States to Provide Cantwell With Reasonable Access To The Court And The Record was mailed

to the Clerk of the Court, 1st Class Postage prepaid, for posting upon the ECF, to which all parties are subscribed, as well as handed to USP-Marion staff members Nathan Simpkins and/or Kathy Hill for electronic transmission to the Court this 23rd day of September, 2021.



Christopher Cantwell